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September 15, 2015

Nicole Miller  
Senior Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Identification Number: C00004036  
RE: July Monthly Report (06/01/2015-06/30/2015)

Dear Ms. Miller:

This letter is in response to the Commission's request for additional information regarding certain payments disclosed on Schedule B of SEIU COPE's monthly report, specifically \$849,139.44 in payments to SEIU for "Reimbursement for Political Program Support Grants" and "Reimbursement for Federal PAC Fundraising Awards."

First, with regard to the \$848,139.44 for "Reimbursement for Political Program Support Grants," these were costs relating to political program support grants that SEIU had made to its State Councils; these grants cover the administrative costs of operating the political programs of the State Councils.

By way of background, SEIU is a 1.8 million member international labor union with 141 active local unions and 18 State Councils. SEIU State Councils are intermediate bodies of SEIU, and serve as the unifying political voice for SEIU local unions in that state. Examples of SEIU State Council activities include: coordination of SEIU's lobbying efforts at the state and local level on matters of importance to our members; member political education and mobilization around state and local elections, as well as SEIU's issue agenda; and member-to-member political communications. SEIU State Councils do not make, nor facilitate the making of, any contributions to federal candidates or their political committees from the SEIU State Council general treasuries.

SEIU's political program support grants to its State Councils cover their administrative and overhead costs (such as office space rental, staff salaries, benefits, and travel), as well as the costs of member-to-member political communications. These are costs that SEIU could have paid for directly, but chose to have reimbursed by SEIU COPE because these are political expenditures that are appropriate COPE disbursements.

Second, with regard to your request for additional information about the "Reimbursement for Federal PAC Fundraising Awards," the \$3,172.50 represents the cost of 15 plaques (framing and artwork printing costs) that were given to the top 15 SEIU local unions that met certain COPE fundraising goals. SEIU is permitted to pay for the cost of these awards out of its general treasury under 11C.F.R. 114.5(b), which permits a connected organization to pay for the solicitation costs of its separate segregated fund. It is also a permissible expenditure by COPE to reimburse SEIU for these fundraising costs.

I hope this information is responsive to your requests. Please do not hesitate to contact me directly if the Commission requires any further information at [dora.chen@seiu.org](mailto:dora.chen@seiu.org) or (202) 730-7469.

Sincerely,

Dora V. Chen

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Associate General Counsel  
Counsel to SEIU COPE

cc: Michael P. Fishman, Treasurer, SEIU COPE